

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

FORD GLOBAL TECHNOLOGIES, LLC,

Plaintiff,

v.

**NEW WORLD INTERNATIONAL, INC.,
AUTO LIGHTHOUSE PLUS, LLC and
UNITED COMMERCE CENTERS, INC.,**

Defendants.

Case No. 3:17-cv-03201-N

**PLAINTIFF'S MOTION FOR SPOILIATION
SANCTIONS**

COMES NOW, Ford Global Technologies, LLC (“FGTL”) and files this Motion for Spoliation Sanctions, and would respectfully show unto the Court as follows:

FGTL hereby moves the court for an order of sanctions against Defendants. Counsel for FGTL has conferred with counsel for Defendants in the above styled and numbered cause and Defendants are opposed to FGTL’s motion.

WHEREFORE, PREMISES CONSIDERED, FGTL prays that the Court enter an order granting its motion for spoliation sanctions and for such other and further relief as to which it may show itself justly entitled.

Date: August 20, 2018

Respectfully submitted,

/s/ Marc Lorelli

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CERTIFICATE OF ELECTRONIC SERVICE

On August 20, 2018, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or *pro se* parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5 (b)(2).

BROOKS KUSHMAN P.C.

/s/ Marc Lorelli

CERTIFICATE OF CONFERENCE

In compliance with Local Rule CV-7.1, Marc Lorelli, counsel for Plaintiff, conferred with Robert Oake, lead for defendants, on August 17, 2018 by phone in a good faith attempt to resolve the matter without court intervention. The parties could not reach agreement. Discussions have conclusively ended in an impasse, leaving an open issue for the Court to resolve.

By: /s/ Marc Lorelli

Counsel for Plaintiff